



February 7th, 2012

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: LightSquared Petition for Declaratory Ruling
IB Docket No. 11-109; ET Docket No. 10-142

Dear Ms. Dortch:

On behalf of VoX Communications, a mobile VoIP and video cloud based technology company, I am writing in support of the Petition for Declaratory Ruling filed by LightSquared Inc. on December 20, 2011 and placed on public notice by the Commission on January 27, 2012.

As the Commission knows, LightSquared will operate its planned 4G LTE wireless on a wholesale basis. This approach will enhance competition significantly by facilitating the ability of new providers to enter local, regional, and nationwide markets and serve consumers. LightSquared is unique in its approach to facilitating visionary competition and innovation in the Telecommunications space. At VoX we see a future where there will be a de-coupling of the data 'pipe' and content service providers. As a mobile VoIP and video carrier, we offer text, voice and video anywhere in the cloud and these services will work equally well on LightSquared's 4G LTE network. These three services are examples of cloud based communications and nimble innovators like VoX are better suited and able to offer next generation services than incumbent carriers, who have no motivation to innovate and no ability to develop these services. LightSquared will allow innovators "mobile access to the cloud."

Imagine a world where you can attach a mobile oximeter to your finger and your vital signs could be transmitted to your doctor, and you could consult with him by video on your phone – this is not possible today given the high cost of reasonable data service.

Imagine if the Emergency Services in 911 could have had smart phones that had IP communications instead of traditional switched based services and the LTE data network could handoff to Wi-Fi – or even a LightSquared LTE Network Node provided by an emergency data tower that could be erected in 4 hours where video communications was considered essential?

Imagine a world where TV's are running on Android and have a LightSquared 4G LTE "bridge" to the cloud, where the Cable co's now have true competition for channel and content. Imagine if your TV could be used to make a video call to family on the other side of the world with perfect high definition voice and video.

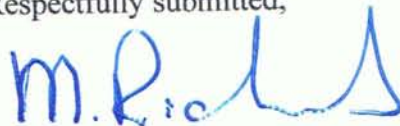
At VoX, we can imagine, which is why LightSquared is an enabler to empower not just the next generation of products, but the next generation of living in America. More specifically, LightSquared's wholesale-only model allows VoX and other LightSquared partners to overcome the high barriers to market entry—including potentially prohibitive network deployment and roaming

costs, as well as spectrum scarcity—that could otherwise unduly raise their operating costs, or preclude them from operating altogether. Incumbent carriers have traditionally offered a ‘retail minus’ wholesale data model, which does not provide sufficient margins to the competitive market. This is why the MVNO model historically failed. Given a fair cost-plus price for data, innovators would flourish and there would be a resurgence of the MVNO model because the network barriers would be removed. A network in the cloud would reduce the cost of entry for many land based services to ‘go mobile’, including such services as telemedicine, micro payment processing and enhanced emergency services. As innovators, we see a virtually unlimited opportunity because LightSquared is the tipping point to providing a network on which these services can be offered. “Fixed mobile convergence” is a real opportunity for investors and innovators to create the next billion dollar services industry. By affirming LightSquared’s rights as described in the Petition, the Commission would facilitate our ability to deliver the tangible benefits of more robust competition to consumers in the form of higher quality service, lower rates, and expanded voice and broadband service options all at a lower price point. As a mobile VoIP carrier, we understand the true cost of sending a text message and a minute of voice in the cloud. We feel that the cost savings that would absolutely be enabled by LightSquared would be passed to the American consumer. Mobile computing and communications should be affordable to every American, irrespective of income level. This is simply not the case today.

At the same time, granting LightSquared’s Petition would reinforce the integrity of the Commission’s rules, and provide the regulatory certainty necessary for companies like VoX Communications and LightSquared to attract investment and continue developing innovative communications solutions that truly benefit consumers. It bears emphasis that LightSquared’s Petition does *not* ask the Commission to waive its rules or afford LightSquared special treatment in any way. Rather, the Petition merely asks the Commission to affirm its *existing* legal and policy framework for spectrum licensing and usage rights, which (i) has been in place for decades; (ii) formed the basis for the technical standards developed cooperatively by LightSquared and the commercial GPS industry almost a decade ago; and (iii) has been relied upon by LightSquared and its investors, customers, and others throughout the implementation of the LightSquared network.

Hundreds of millions of American consumers would benefit from the greater competition that would be made possible by LightSquared’s network—consistent with the objectives of the *National Broadband Plan*. Accordingly, I urge the Commission to grant LightSquared’s Petition on an expedited basis.

Respectfully submitted,



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